

U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

June 11, 2013

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BY HAND

The Honorable Miriam Goldman Cedarbaum United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Chambers 1330 New York, New York 10007

MEMO ENDORSED

Re:

United States v. Abassi 13 Cr. 304 (MGC)

Dear Judge Cedarbaum:

The Government writes, with defendant Ahmed Abassi's consent, to respectfully request that the Court exclude from the Speedy Trial Act's operation the time between today and July 17, 2013, the date of the next pretrial conference in this matter.

On May 24, 2013, the Government produced a substantial amount of unclassified discovery to the defense, including reports memorializing statements Abassi made to law enforcement; over 20 recordings (consisting of dozens of hours) of conversations involving Abassi and a Federal Bureau of Investigation undercover officer, much of which occurred in Arabic; and draft translations and summaries of several portions of those recorded conversations. In addition, the Government is collecting classified discovery for production to the defense.

The Government therefore moves to exclude the time between today and July 17, 2013 in the interests of justice, to afford the defense an opportunity to review the voluminous discovery already produced—much of which is in Arabic—and to allow the Government time to collect

Request granted, So ordered.

Shuted States District Judge
June 11, 3013

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and produce classified discovery. <u>See</u> 18 U.S.C. § 3161(h)(7)(A). Defense counsel has expressly consented to such an exclusion on Abassi's behalf.

Respectfully submitted,

PREET BHARARA
United States Attorney

By:

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Cc: Sabrina P. Shroff, Esq. (by email)